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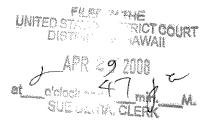
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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JEANNE K. ENDO,

Plaintiff, ) PLAINTIFF'S PROPOSED CONCISE
STATEMENT OF THE CASE;

V. ) CERTIFICATE OF SERVICE

UNITED PUBLIC WORKERS, AFSCME )
LOCAL 646, AFL-CIO, )

Defendant. )
UNITED PUBLIC WORKERS, AFSCME )
AFSCME LOCAL 646, AFL-CIO, )

Third-Party Plaintiff, )

V. )

GARY W. RODRIGUES, )

Third-Party Defendant. ) TRIAL DATE: May 13, 2008

## PLAINTIFF'S PROPOSED CONCISE STATEMENT OF THE CASE

Plaintiff Jeanne K. Endo, by and through her counsel, hereby submits her Proposed Concise Statement of the Case:

Plaintiff, Jeanne K. Endo, has been an employee of Defendant UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO ("UPW"). Plaintiff alleges that during the period Third-Party Defendant Gary W. Rodrigues ("Rodrigues") was the State Director for the UPW, and

Plaintiff's supervisor, she was subjected to hostile work environment sexual harassment.

In addition, Plaintiff alleges that she was subjected to unlawful reprisal when she refused or resisted Rodrigues' alleged sexual advances, and filed a discrimination complaint against the UPW with the Equal Employment Opportunity Commission and Hawaii Civil Rights Commission.

DATED: Honolulu, Hawaii, April 29, 2008.

CLAYTON C. IKEI JERRY P.S. CHANG

Attorney for Plaintiff JEANNE K. ENDO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JEANNE K. ENDO, ) CIVIL NO. 03-00563 LEK

Plaintiff, ) CERTIFICATE OF SERVICE

V.

UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO,

Defendant.

UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO,

Third-Party Plaintiff,

V.

GARY W. RODRIGUES,

Third-Party Defendant.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing document was duly served upon the following parties at their last known address U.S. Mail, postage prepaid on April 29, 2008:

TO: ERIC A. SEITZ, ESQ.
LAWRENCE I. KAWASAKI, ESQ.
820 Mililani Street, Suite 714
Honolulu, Hawaii 96813

Attorneys for Third Party Defendant Gary W. Rodrigues

JAMES E.T. KOSHIBA, ESQ. CHARLES A. PRICE, ESQ. KOSHIBA AGENA & KUBOTA 2600 Pauahi Tower 1001 Bishop Street Honolulu, Hawaii 96813

Attorneys for Defendant UPW, AFSCME, LOCAL 646, AFL-CIO

DATED: Honolulu, Hawaii, April 29, 2008.

CLAYTON C. IKEI JERRY P.S. CHANG

Attorneys for Plaintiff JEANNE K. ENDO